



Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

December 23, 1992

Mr. Bob Shajary
Plant Manager
Georgia-Pacific Corporation
P.O. Box 80
Sigurd, Utah 84657

Dear Mr. Shajary:

Re: Review of San Rafael Gypsum Quarry Large Mine Notice of Intent, Georgia Pacific Corporation, M/015/050, Emery County, Utah

This letter is to inform you that the Division has re-initiated its review of Georgia Pacific Corporation's permit application for the San Rafael Quarry Project. On March 15, 1991, the Division mailed a conditional tentative approval letter to Georgia Pacific. The tentative approval was conditioned upon our receipt of a response from Georgia Pacific to the review questions raised in the letter. Because of the suspension of mining activities by Georgia Pacific, and the subsequent recategorization of the mine on May 8, 1991, as a Small Mining Operation, these questions were never addressed by the operator. As a result, the tentative approval was dropped.

The mining operation was reactivated in January of 1992. The BLM has already granted approval of a Plan of Operations for this site and maintains a \$20,000 surety. In order to bring our records up-to-date the Division is now asking that Georgia Pacific complete the state required permitting procedures for this site.

This letter covers some of the same review questions raised in our March 91 letter, but has been adjusted to also address the changes made to the mine plan since the original submittal in November of 1990. Our most recent correspondence indicates an amendment to the mine plan dated September '92. Because of the outstanding technical questions and the need to generate an acceptable surety figure, we ask that Georgia Pacific address the following questions prior to our re-issuance of Tentative Approval:

R647-4-105 Maps, Drawings and Photographs

105.2.11 Proposed Surface Facilities

- ✓ The submitted surface facilities map is of an adequate scale (1" = 200'), however, it does not show the proposed drainage control structures mentioned in the plan. These will need to be displayed on the map.

105.2.12 - Border Outlining Acreage

- ✓ The operator has indicated that a total area of approximately 33 acres will be disturbed over the life of the mine. According to our measurements taken from the map (amended 8-25-92), the total disturbed area is approximately 31 acres. Will the proposed life of mine disturbance still be 33 acres? What is the current disturbance and how will this figure vary over the next five years? Please indicate on a map the proposed total disturbance and the current disturbance.

105.3 - Maps, Drawing and cross-sections

- ✓ Please provide a reclamation treatments map, indicating the portions of the site to be reclaimed and in what fashion (e.g., indicate which portions of the disturbance will be retopsoiled vs. not topsoiled, also indicate which areas will be regraded vs ripped). If there are portions of the site which will not be reclaimed please clearly identify these areas on the map.

Please provide a general cross-sectional drawing of the reclaimed quarry area.

R647-4-106 Operation Plan

106.3 Estimated acreage

- ✓ Please provide a specific acreage estimate of disturbance to cover the next five years (see R647-4-105.2.12). The plan indicates that the operation will disturb approximately 33 acres over the life of the mine. The surety estimate will be based on a five year term, so any information you provide, concerning acreage, should represent your best prediction of the total disturbance, for the next five years. You may also want to consider having the surety cover more than the five year average to avoid having to change the amount to a higher figure after five years (e.g., life of mine coverage).

106.5 - Existing soil types, location of plant growth material

The operator has provided limited information regarding the total projected volume of topsoil materials to be salvaged. This information will affect the reclamation cost estimate as well as the revegetation success at the site and should be provided.

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1 The operator has indicated that the quantity of topsoil to be salvaged onsite will equal 3,226 cubic yards, for a 1.5 acre area to a depth of 2 feet. If topsoil is salvaged over a 10 acre area to a depth of 2 feet, the total volume will equal 32,266 cubic yards. It is our understanding that the current disturbed acreage is approximately 10 acres. Please update your volume calculations to represent what is currently in place and what additional topsoil volume will be salvaged over the next five years.

R647-4-107 Operation Practices

107.1.12 - Disposal of trash, debris

✓ Please explain your method of disposing of trash and debris generated at the site.

107.1.15 - Construction of berms, fences

✓ The plan mentions the placement of safety berms above the highwalls, but no description of these berms is provided. Design drawings and/or a verbal description of these berms should be provided.

107.2 and 107.3 - Drainages to minimize damage and Erosion Control

✓ A recent amendment to the plan indicates that the ephemeral drainage channel immediately adjacent (west) of the present quarry area may eventually be mined through. The Division requests that specific mine development details be prepared by the operator and approved by the BLM and Division prior to mining into/through this drainage. Design details will be required describing how the quarry will be expanded through the channel and how the normal drainage will be rerouted.

107.6 - Concurrent Reclamation on areas when no longer needed

- ✓ Please describe how areas of the site which are no longer needed for mining will be reclaimed, and what sort of time frames might be involved. Contemporaneous/concurrent reclamation will help to keep your surety costs down, by keeping the amount of disturbed acreage to a minimum.

R647-4-110 Reclamation Plan

110.1 - Current land use and postmining landuse

- ✓ The proposed reclamation plan includes four basic steps: 1) clean-up and removal; 2) backfill, grade and recontour; 3) soil redistribution and stabilization; and 4) revegetation. In addition to these steps, the pit floor(s) and roads will need to be ripped to a depth of at least 12 inches prior to soil redistribution. The erosion control structures will also need to be reclaimed if any are constructed.

110.5 - Revegetation planting program and topsoil redistribution

- ✓ Please indicate which areas of the site will be retopsoiled (see item R647-004-105.3).

110.2 - Roads, Highwalls, slopes, drainages, pits, etc.

- ✓ The plan calls for the pit highwalls to be regraded to a 3:1 slope upon reclamation. It is unclear what the configuration of these highwalls will be before this regrading (i.e., 40 feet high with no bench, or 20 feet high with a bench x-feet wide and another bench 20 feet below?). This configuration will have an effect on the Division's estimate for reclaiming the highwalls and should be provided.

R647-4-111 Reclamation Practices

111.2 - Reclamation of natural stream channels

- 3 The ephemeral drainage running parallel to the mine site on the west side (discussed under item R647-004-107.2 and 107.3) will be impacted by mining. How will this drainage be reclaimed and stabilized?

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R647-4-112 Variances

No variances were requested.

R647-4-113 Surety

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The operator has provided a reclamation cost estimate of \$450/acre to perform the four basic reclamation steps outlined above. This does not include the cost of ripping the pit floor(s) and roads, or reclaiming any erosion control structures. Also, the cost for redistribution of the overburden and topsoil materials seems low. Georgia Pacific needs to provide the Division with more specific information concerning the amount of overburden to be removed and then placed back over the mine disturbance. The replacement of overburden may add a considerable amount to the total reclamation costs.

An adequate reclamation cost estimate cannot be calculated by the Division until the operator provides the information requested. Namely, a response to the disturbed acreage question, estimated amounts of overburden and topsoil materials to be salvaged for use in reclamation, and a description of the highwall configuration prior to final reclamation.

Please contact me, or Holland Shepherd, should you have questions or concerns regarding the content of this letter. Thank you for your continued cooperation and assistance in completing this permitting action.

Sincerely,



D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

jb
cc: James Dryden, BLM, San Rafael Resource Area
Lowell Braxton, DOGM
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